

FCC E911 Compliance Letter 8/10/2005

Concerning FCC Docket No. 05-196,

Our ReignmakerTM REIGN-FREETM Hosted PBX service supplies FULL E911 functionality. We've accomplished this by leveraging Level 3's Enhanced Local Service (ELS), which allows us to purchase telephone numbers and full emergency 911 services contractually. Furthermore, Reignmaker does NOT provide residential service, instead providing service exclusively to the business market. We further don't support 'mobile' VoIP services. In fact, moving any of our IP phones to another physical location (regardless of broadband provider) will result in the phone simply not working. This is because Reignmaker purposefully designs its service to work only behind a very specific 'edge' device (CPE Router) which we configure and install at the customer's physical location.

However, the ruling on this docket states all VoIP providers must supply and then receive written acknowledgement of any circumstance in which the E911 service may NOT be available or may only be available in a limited fashion. Therefore we are supplying this report to the commission to detail our efforts to comply with their ruling.

ACTIONS TAKEN:

- Every REIGN-FREETM 'customer of record' (Business owner or executive that has signed the Reignmaker contract) has received an E911 acknowledgement letter describing our E911 service. We're requiring each of them to sign and fax back the letter which will be stored along with their contracts in their permanent record.
- All new customers are now being required to sign the same acknowledgement prior to being installed. Again, this is being stored in their permanent record along w/ their contract.
- Reignmaker is also developing warning 'stickers' for all CPE. These stickers will be placed on each of the phones and 'Edge' routers. They will also explain to the customer the equipment we've installed will not function if it is moved to another physical location. It further states this is a safety feature to ensure they always have emergency 911 service, and should they desire to move the equipment they should call our 1-800 number and we'd be happy to move it for them.

To date Reignmaker has received the signed acknowledgement from more than 42% of our customers. However, we will follow up individually to ensure 100% compliance by Aug. 29th. In the event this doesn't happen, Reignmaker is prepared to disconnect any customer that does NOT return the E911 notification form.

Furthermore, Reignmaker is developing and deploying warning labels (stickers) that will be sent to each of our customers along w/ an instruction letter. The letter will explain the FCC's requirement for warning labels and ask them to apply the stickers 'in plain view' on each of their IP handsets and 'Edge' devices.

We are dedicated to remaining 100% compliant w/ the FCC's filing and can be contacted per the information provided below if there are questions.

Sincerely, Brian E. Henderson



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